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May 18, 2021

## VIA ECF

Honorable Robert E. Grossman United States Bankruptcy Judge United States Bankruptcy Court Alfonse M. D'Amato Courthouse 290 Federal Plaza Central Islip, New York 11722

Re: Myint Kyaw a/k/a Jeffrey Wu

Case No. 820-72407-A736

Harary Group, LLC v. Myint Kyaw a/k/a

Jeffrey Wu

Adv. Proc. No. 820-08162-A736

Dear Judge Grossman:

This firm is counsel to the Debtor-Defendant in the above-referenced adversary proceeding.

This letter is written with the consent of Plaintiff's counsel as the parties are jointly requesting that Your Honor adjourn the motion to compel discovery that is scheduled for May 24, 2021 for thirty (30) days and extend the discovery deadlines to July 31, 2021. The reason for this joint request is that the parties have had substantial settlement discussions over the past thirty (30) days and have made substantial progress in narrowing the dispute and both sides are optimistic that a settlement will be finalized within the next thirty (30) days.

The parties request the discovery extension in case the settlement is not finalized as the parties are trying to minimize their clients' respective litigation costs.

Respectfully yours,

Marc A. Pergament

MAP:cb

cc: Via E-Mail - aid@ansellgrimm.com

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